

ORIGINAL  
FILE

June 9, 1992

**HAND DELIVERED**

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Rm. 222  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: GC Docket No. 92-52  
Notice of Proposed Rulemaking  
Comparative Broadcast Hearings

Dear Ms. Searcy:

Enclosed is the original for filing, and fourteen (14) copies of the Request for Extension filed jointly by the Association for America's Public Television Stations ("APTS") and National Public Radio ("NPR"), in the above-referenced matter.

Please date stamp one of the enclosed copies and return to APTS with our messenger today.

Sincerely,

*Karen Christensen (mmg)*

Karen Christensen  
Assistant General Counsel, NPR

*Marilyn Mohrman-Gillis*

Marilyn Mohrman-Gillis  
General Counsel, APTS

MMG:nk

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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	GC Docket No. 92-52
	)	
Reexamination of the Policy	)	RM-7739
Statement on Comparative	)	RM-7740
Broadcast Hearings	)	RM-7741

**REQUEST FOR AN EXTENSION OF TIME BY  
THE ASSOCIATION AMERICA'S PUBLIC TELEVISION STATIONS  
AND NATIONAL PUBLIC RADIO**

The Association of America's Public Television Stations ("APTS") and National Public Radio ("NPR") (jointly "Public Broadcasters") respectfully request that the Commission extend the period of time within which to file reply comments in the above-captioned matter from June 22, 1992 to July 3, 1992 for the reasons stated below.

APTS and NPR, on behalf of most of the noncommercial television and radio stations in this country, filed comments in this proceeding on critical issues raised by the Commission related to the noncommercial comparative criteria. After reviewing the record, APTS and NPR believe it would be necessary and helpful to the Commission to respond to comments regarding the noncommercial comparative criteria filed in this proceeding

APTS is a joint participant in the annual public television membership meeting to be held outside of Washington, D.C. from Saturday, June 20 to and

including Wednesday June 24. The APTS General Counsel, who will be preparing the comments in conjunction with NPR's counsel, as well as key APTS staff, who are required to review the reply comments, will be leaving to attend the meeting on June 19. Prior to that time, the APTS staff, which consists of only 18 employees, is already fully occupied with preparing for the annual meeting. Neither APTS nor NPR is able to hire outside counsel to prepare the reply comments because of budgetary constraints.

One issue raised in this proceeding—whether noncommercial comparative criteria, that have been in effect for 25 years, should be eliminated or modified—is of critical importance to public radio as well as television stations. It will enhance the Commission's deliberative process on this important issue if the Commission permits enough time for the two key organizations, that represent most of the public radio and television stations in the country, to respond adequately to arguments made to "scrap" the criteria.

Moreover, the additional time will permit counsel for APTS to discuss this important issue with its membership at the annual meeting and to hopefully gain information and views that may be helpful to the Commission in reaching its decision. (This issue is on the agenda during one session at the meeting.)

The requested extension—until July 3—will provide APTS and NPR with the least amount of time necessary to review the record, and to prepare, review and file adequate and effective reply comments. An extension of one week, until June 29, would not be sufficient. The APTS staff will not return from the annual meeting until June 25, two working days before the comments would be due.

The Public Broadcasters therefor request that the Commission extend the time for filing reply comments from June 22 until July 3, 1992.

Respectfully submitted,

David J. Brugger (mm 26)  
David J. Brugger  
President

Marilyn Mohrman-Gillis  
General Counsel

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President

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General Counsel

Karen Christensen  
Assistant General Counsel

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June 9, 1992